

February 6, 2003

Carole Washburn, Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504

Re: Staff Comments on Qwest Compliance Filing  
Docket No. UT-003013 *Part B*

Dear Ms. Washburn:

On January 13, 2003, Staff filed a compliance report with the Commission regarding Qwest's Part B compliance filing in Advice 3364T, to comply with the Commission's 32<sup>nd</sup>, 38<sup>th</sup>, and 40<sup>th</sup> Supplemental Orders in Docket UT-003013. In that report Staff noted several areas where Staff was unable to complete its analysis of the filing. The Commission asked Staff and Qwest to continue working together and for Staff to report back to the Commission by February 6, 2003. This report updates the initial report as discussed below. The letters in front of the underlined text correlate to the letters used in Staff's initial report on this compliance filing.

D. Staff cannot ascertain if Qwest applied the Verizon the ratio of disconnect-to-add service work-time to EEL NRCs.

Qwest and Staff are now in agreement as to the ratio of disconnect to work time for UNE EEL NRCs. Qwest will file a replacement sheet once the Commission resolves the remaining Part B compliance issues.

- E. Qwest's proposed NRC for UNE-C New POTS First Line (Mechanized) Disconnect needs to be clarified.

Qwest clarified that it intends that the rates proposed in Part D for UNE-C New POTS (Mechanized) Disconnection (i.e., \$2.53 First line, and \$2.08 Each Additional) be used for purposes of this Part B compliance filing. Qwest will file a replacement sheet once the Commission resolves the remaining Part B compliance issues.

- F. Qwest filed changes to tariff sheets that were not ordered by the Commission.

Qwest and staff have agreed that Qwest will file tariff revisions to remove the USOCs from Tariff WN U-42 in a separate filing.

- B.<sup>1</sup> Qwest used its original time estimates instead of the six minutes processing time for UNE-P POTS Existing Services Initial Install and UNE-C New Service Initial Connection.

Qwest states that it did not use the six minutes of processing time for UNE-P Existing Service because the Commission indicated that it would adopt the rates for this element proposed in Part D. Since the time proposed in Part D was much lower than six minutes (i.e., 0.75 minutes) it did not seem appropriate to substitute the six minutes in the Part B compliance filing.

Staff responds that for UNE-P Existing Service, the order processing time (minutes) Qwest used in both part D and in B is 15 minutes. The .75 minute is a result of the 15 minutes times the corresponding probability. Staff believes that the Commission requires (in part B) that Qwest use 6 minutes in place of the 15 minutes for order processing at ISC, so the result should be 0.3 minutes instead of 0.75 minutes.

Qwest states that it also did not use the six minutes for UNE-C New Service because Qwest adopted staff's recommendation for that service of nine minutes of processing time at a probability of 20%. Using staff's recommendation results in 1.8 minutes of processing time, again a result that is below the six minutes

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<sup>1</sup> Page 3, first paragraph, of January 13 comments.

ordered by the Commission. Thus, in both instances, Qwest believed that by using the lower times in developing these rates it was providing a better result than had it used six minutes.

Staff responded that for UNE-C New Service, Qwest initially did agree with staff's recommendation. However, Qwest then willingly included the 6 minutes in its later revised exhibits (Ex. C-1010). Given that the Commission requires that Qwest use six minutes for processing time, the result should be 1.2 minutes instead of 1.8 minutes. A flow-through order needs zero processing time. The fall out rate should then apply to the six minute rate which the Commission set for processing an order.

In the last communication, Qwest responded that it does not believe that it is appropriate to use the six minutes and then apply a flow-through of 95% on top of that, which is what Staff's recommendation does. The same holds true for the 80% flow-through on UNE-P New. It would result in adjusting for mechanization twice: once in the time estimate and again with the flow-through assumptions.

Staff asks the Commission to provide direction as to whether Qwest needs to use the six-minute time when a flow-through probability is included in the determination of the ISC work time.

Qwest will add the field verification - manhole inspection frequency language to the tariff.

In ¶170 of the 32<sup>nd</sup> Supplemental Order the Commission stated that Qwest's proposal to inspect every manhole along a route was excessive and that as a matter of conducting a pre-order confirmation, Qwest should only inspect those manholes where congestion was likely to occur. In high density corridors (i.e. zones 1 and 2) such inspection should occur once per block and in lower density areas, inspections should occur once every four blocks. Staff and Qwest discussed and agreed that language should be added to the tariff prescribing the frequency of inspection for purposes of providing pre-order confirmation. Qwest will file a replacement sheet once the Commission resolves the remaining Part B compliance issues.

Summary

Staff and Qwest have resolved a number of the concerns raised by staff in the initial report. As a result, the remaining issues are as follows:

1. The development of manual rates for NRCs established in Docket UT-960369 and Part B of Docket UT-003013. Staff asks that the Commission provide Qwest with further guidance as to the calculation of manual rates as necessary. (See initial report, section B).
2. Qwest did not use the six minute work time in calculating the NRC for Mechanized Orders for certain UNEs. Staff believes the order appears to direct Qwest to adopt the six minute work time in developing NRCs for these UNEs. (See initial report, Section C).
3. Qwest used its original time estimates instead of the six minutes processing time for UNE-P POTS Existing Services Initial Install and UNE-C New Service Initial Connection. Staff asks the Commission whether Qwest needs to use the six-minute time when a flow-through probability is included in the determination of ISC work time. (See discussion above at Section B, pages 2 and 3 of this report).

Very truly yours,

MARY M. TENNYSON  
Sr. Assistant Attorney General

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cc: All Parties